

**Broadcast Localism**  
**MB Docket No. 04-233**  
**Comment Summary**

*farm industry companies and fewer new product offerings, especially in the crop protection area.*

IFB states that radio is a valuable resource to farmers because they are mobile throughout the day and it can follow them anywhere.

IFB states that the decline in advertising dollars to support farm radio has made it vulnerable, and that unless station owners have a strong commitment to their rural audience, the drop in revenue is a convenient excuse to remove farm programming.

IFB encourages the Commission to include farm programming in any initiative to encourage more community-responsive programming.

**Independence Television Company (ITC), Bill Lamb, President and General Manager (9/29/04)**

Mr. Lamb states that viewers and community leaders are given an opportunity to voice their opinions anywhere from twice a month to twice a week, depending on how many people want to voice their concerns. He states that ITC put together an Editorial Advisory Board consisting of the top business, political and community leaders in the Louisville, KY and Southern Indiana area which meets once a quarter to share community issues and solutions. He also states that ITC ensures that every viewer letter or email is answered.

Mr. Lamb states that WRDB and WFTE devote 6 ½ hours per day Monday through Friday to local news and that the morning news features at least one live interview per day with an individual representing a local charity or outreach program. Mr. Lamb also states that for two weeks before the Kentucky Derby, the morning show is run from the backside Churchill Downs. He also states that both stations provide editorials four days a week and occasionally include a “call to action” from viewers. Mr. Lamb states that the stations aired two telethons to raise funds for the Louisville Orchestra and preempted Fox network programming. Mr. Lamb states that ITC produces and televises 20 University of Louisville football and basketball games and 10 women’s teams.

Mr. Lamb states that, during the 2002 campaign for U.S. House of Representatives 3<sup>rd</sup> District seat, ITC offered both candidates the opportunity to debate the issues live on television.

Mr. Lamb states that local weather and traffic reports are provided every ten minutes during the morning news and that both WRDB and WFTE participate in AMBER alerts. He also states that the station sent crews to Florida to cover hurricanes because many people in Louisville vacation or have second homes in Florida.

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Mr. Lamb states that a local band is featured on the station's morning show each Friday and that every day, the morning show features an interesting local event, festival or business twice an hour for four hours.

Mr. Lamb states the he serves on five boards of Directors as General Manager of Independence Television Company. He states that the stations are actively involved in 8 major charitable or community events and involved to a lesser degree in several other events. He also states that several volunteers from the stations work closely with local children's literacy programs and that WRDB has partnered with local organizations to create "Basics for Kids" to clothe needy children.

Mr. Lamb states that, "it is in the best interest of every local television station to do as much local television as they can. Our viewers want local. They want to know what is happening on their roads, in their schools, and in their community. For us to be successful we must serve our viewer with as much local information and service as we can. Every local television broadcaster I know works in much the same way to serve their local community. We, as general managers, are leaders in our communities and we all want to contribute to the area in which we live. And for the more cynical who don't quite buy the altruistic angle, surely we can believe local stations will continue to serve their local markets because it's also good business."

**Infinity Broadcasting Corporation (Infinity) (3/26/04)**

Infinity attaches a report entitled, "Localism and Independence at Infinity Radio Stations: The Many Ways We Serve Our Communities." Infinity states that the report provides extensive evidence of the involvement of Infinity's radio stations in their local communities. Infinity further states that the examples in the report demonstrate their commitment to localism and independence every day by supporting local artists and community activities, programming to the needs of their communities, ensuring up to date and complete coverage of local emergencies, and keeping lines of communication open to their listeners.

**Israel, Carolyn T., filed under Numerous (8/23/04)**

Ms. Israel states that she is concerned that artists are losing venues because of differences in opinions with the owners of venues. Ms. Israel contends that NPR is being pressured to include more views of the "right," and that we are close to losing our democracy because of the actions and inactions of the FCC.

**Jackson Radio Works, Inc. (11/01/04)**

Bruce and Susan Goldsen state that they are the owners of Jackson Radio Works, Inc., licensee of WKHM AM/FM and WIBM and that they sincerely believe that an educated electorate is important to our democracy. They state that, more than any other medium,

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*local radio, with its ability to provide an interactive forum, gives that electorate a unique ability to engage in an ongoing exchange of ideas and opinions.*

The Goldsens further state that they are “but three of the thousands of stations across the United States that share this commitment to our communities [and that they] do these things not because [they] must, but because [it] insures that [their] communities will continue to look to [them] as their primary source for local news, entertainment and information.”

**Jay Dancing Bear, filed under Numerous (8/23/04)**

Jay Dancing Bear states that having only one meeting for the West Coast makes a mockery of American democracy.

**Jewish Family and Children’s Service, filed by Schwartz, Betty (1/29/04)**

Ms. Schwartz states that the Jewish Family and Children’s Service (JFCS) is a non-profit social service agency that has been a source of hope and help for individuals and families in the San Antonio community since 1973. She says its staff includes licensed clinical social workers, licensed professional counselors, professional education, master-level interns, and case managers, and its challenge is to distribute this information to the general public.

According to Ms. Schwartz, JFCS needs the support of the media to promote events in this age of rapid communications; per studies, most people receive the majority of their information from mass media, specifically radio. She states KTSA has partnered with JFCS in this regard, JFCS has been very fortunate, and has benefited from its association with KTSA. Ms. Schwartz gives two recent examples: (1) in December, 2003, a JFCS staff therapist was a guest on KTSA and discussed the dilemma between expectations and reality during the holiday season, and many listeners might have been helped in recognizing some of the problems; and (2) KTSA helped promote a fundraising event for JFCS in January, 2004, by having Dr. Ruth Westheimer as a guest discussing a sensitive topic and allowing “Dr. Ruth” to mention her appearance on behalf of JFCS – advertising otherwise unaffordable for JFCS.

**Joint Broadcasters (consisting of Dispatch Broadcast Group, LIN Television Corp., Midwest Communications, Paxton Media Group, Inc., Post Newsweek Stations, and Raycom Media) (11/1/04)**

Joint Broadcasters oppose mandated localism rules or policies. They note the many benefits that have flowed from a flexible and open approach to localism rather than “a regimented, government dictated scheme.” Joint Broadcasters contend that local television stations, when given appropriate flexibility, can determine how best to meet

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*community needs and interests, and will to lead to more diverse programming that reflects the differing needs of their communities.*

Joint Broadcasters provide numerous examples of community-responsive programming, including, local news, emergency and disaster warnings/EAS information, local sports and weather, coverage of local and state political races, on-air fundraising, health and educational information, and programming for underserved audiences (minority, religious and youth. Joint Broadcasters also provide examples of off-air civic activities and outreach efforts.

**The Arizona Broadcasters, Association, Kentucky Broadcasters Association, and Montana Broadcasters Associations (Joint Commenters) (11/1/04)**

The Joint Commenters urge the Commission to find that no new policies, practices or rules are needed to promote localism. The Joint Commenters state that communities across the country are currently well-served by their local broadcast stations through programming designed to meet the news, informational and entertainment needs of their communities, as well as through civic, charitable and community involvement.

The Joint Commenters state that the Commission should recognize broadcasters' community involvement as a key element of localism. The Joint Commenters cite as examples of community involvement such activities as sponsoring a health fair or holding a fundraiser for volunteer fire departments. The Joint Commenters also state that the specific type or level of community involvement that satisfies a broadcaster's public service obligation should not be mandated.

Instead of circumscribing community-responsive programming, the Joint Commenters state that the Commission should adopt a "hands off" approach and encourage the diversity and creativity that results when each broadcaster determines, on its own, how best to serve its community. Initiatives such as "Amber Alert" programs are cited to demonstrate that broadcasters can be attentive to the communities' needs and interests. The Joint Commenters state that to the extent that the Commission attempts to determine what types of programming do or do not serve a community, approaches prohibited content regulation.

The Joint Commenters state that, based on their own experiences and industry contacts, they are confident that the record will demonstrate that broadcasters' good faith efforts, in conjunction with competitive forces, have been and remain sufficient to ensure that broadcasters timely identify community needs and interests and fulfill their responsibilities to their communities. They also state that the Commission's existing policies, practices and rules provide the supplemental force necessary to address isolated instances of irresponsibility.

**Jones, Julie (1/28/04)**

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*Ms. Jones states that it is in the best interest of the community for the local affiliate to control its own programming, and that if the national affiliate is allowed to buy out the local affiliate then local programming like the First Baptist Church, San Antonio, Texas broadcast would not be allowed to continue. Ms. Jones also states that elderly citizens like her parents or others who are unable to attend church depend on local church broadcasts for their worship time.*

**Jones, Philip M. and Dorothy (1/28/04)**

Philip M. and Dorothy Jones, both of whom are nearly 90 years old, state that they reside in an extended care facility, and are no longer able to attend services at their church, the First Baptist Church, San Antonio, Texas. The Joneses state that the First Baptist Church's weekly telecast on Channel 13 is a very important part of their spiritual lives and that they would suffer a tremendous loss if the telecasts were discontinued.

**Journal Broadcast Group, Knoxville Operations, filed by Chris Protzman, GM (10/27/04)**

Mr. Protzman states that the Knoxville stations are committed to serving the community, exceeding the expectations of the community and FCC. Mr. Protzman states that it is important that the FCC get first hand accounts of the critical roles played by licensed broadcasters in helping to educate the public, and to help eliminate the human sufferings of the community. Mr. Protzman documents the daily, weekly and monthly steps his stations take in this regard. Mr. Protzman states that the future relevance to their commercial audience is directly tied to this commitment, and is also the right thing to do both as a community citizen and as a corporate partner. The localism examples that Mr. Protzman cites include the weekly community talk show "East Tennessee Report," as well as "The Radio Health Journal." Mr. Protzman enumerates the stations' involvement in community charity events, and list PSAs and newscasts of local relevance that the stations have aired.

Mr. Protzman states that radio began as a dynamic local communications service, and that his stations today continue to serve in that tradition of localism.

**Journal Broadcast Group – Springfield Operations (JBG Springfield) (11/1/04)**

JBG Springfield explains that it operates five radio stations in Missouri. These stations cover a variety of local meetings such as city council meetings and school board meetings. JBG provides 168 news reports every week.

JBG Springfield provides a local public affairs program every weekday from 6 a.m.-9 a.m. All emails are forwarded to the General Manager, and the majority receives responses.

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JBG Springfield provides examples of specific programming directed at local community, political and emergency issues. In particular, JBG Springfield estimates that 30 hours per year are dedicated to severe weather emergencies such as tornadoes.

JBG Springfield provides examples of participation in various community activities. The station extends regular invitations to charitable organizations to appear on the radio.

**Journal Broadcast Group – Wichita Operations (JBG Wichita) (10/28/04)**

JBG Wichita attaches information describing the station's efforts to address local issues facing its community and its use of the airways to serve the public. JBG Wichita states that it presents public service programming based on needs and concerns of the Wichita community, and it provides various examples of its communications with community leaders to identify specific needs and views concerning public affairs programming.

JBG Wichita states that it airs a one-half hour program each Sunday morning on five different radio broadcast stations concerning local issues, and it lists some recent topics. JBG Wichita states that its News Director decides the issues to be covered and assigns a different reporter each week to interview both sides of an issue. JBG Wichita also states that each Monday morning, on one broadcast station and each Wednesday morning on another station, JBG Wichita airs a crime-stoppers program from the Wichita Police Department.

JBG Wichita states that it airs a 30-minute program on five stations addressing topics of community interest and that a sixth station airs a Spanish-speaking public affairs program. JBG Wichita also states that its stations make time available during regular programming to address current topics and make efforts to include community-based and issue-oriented programming during JBG Wichita's weekly programming schedule. JBG Wichita states that its public service announcements air in live and/or recorded form on all stations.

JBG Wichita provides a lengthy, detailed narrative of its participation in community activities. JBG Wichita states that its stations consistently are involved in community initiatives and campaigns and names many examples of these activities. JBG Wichita states that its News Department is active in many areas of the community and provides examples.

JBG Wichita states, for over 30 years its reporters have covered breaking local news events, and it provides examples. JBG Wichita states that a staff of full-time and part-time reporters and anchors are equipped with state-of-the-art digital recorders and operate four mobile news units containing emergency scanners and two-way radios. JBG Wichita also states that it has a newscast at the top of each hour, 24 hours a day, seven days a week.

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JBG Wichita discusses its severe weather coverage, saying that for over 30 years, its reporters have trained yearly with the National Weather Service ("NWS") to describe severe weather to listeners. JBG Wichita describes training sessions that occur each year, claiming when a severe thunderstorm or tornado warning is issued in relevant counties, immediate severe weather coverage begins, no music is played, very few commercials are aired, and the news department takes over programming until the warning expires or is lifted by the NWS.

JBG Wichita discusses its additional emergency programming, saying locally, severe weather coverage is the most frequent. JBG Wichita states that it has flood coverage when lives and property are affected and that, when a state Amber Alert is issued, the announcement is immediately broadcast on all five stations, with additional follow-up information every 15 minutes for two-to-three hours. JBG Wichita also states that Emergency Alert System testing takes place regularly and, nationally, its stations broadcasted live news coverage for over 24 hours on the space shuttle crash in February, 2003, and the terrorist attacks on 9/11.

JBG Wichita states that it states that for seven Monday mornings in a row, September 20, through November 1, two of its stations aired a political program at 6:00 a.m. and 8:00 a.m. and that one of its announcers helped to register voters at a convenience store on two occasions. Several At-Issue programs dealing with politics in 2004 are detailed in the Quarterly Reports filed by the stations.

**Journal Broadcast Group – Omaha Operations (JBG Omaha) (10/28/04)**

JBG Omaha provides locally-oriented newscasts throughout the week, and states that, combined with the Omaha radio group, it offers nearly 500 hours of local news, including Spanish language radio newscasts. In addition, JBG Omaha states that it provides a Spanish-language program devoted to discussion of local issues.

JBG Omaha states it conducts quarterly staff meetings to identify issues of local concern, and that programming is developed and produced locally based on local market factors.

JBG Omaha provides examples of political and emergency programming which its stations provide to the community, including local debates on current Nebraska ballot measures, Amber Alert, and EAS programming. JBG Omaha also states it has devoted resources to various charitable organizations and causes.

**Junior Achievement of South Dakota, Inc. (Junior Achievement) (6/28/04)**

Junior Achievement expresses satisfaction with the opportunities provided by local broadcasters to air public service announcements regarding the efforts and initiatives of

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that organization. Junior Achievement indicates that local broadcasters have been open to hear the needs of that program and generous with their influence and resources.

**Kanalakis, Mike, Sheriff of Monterey County (7/20/04)**

Mr. Kanalakis expresses support for the local television and radio broadcasters in Monterey. Mr. Kanalakis indicates that as an elected official he has found political coverage to be thorough, comprehensive, and informative, and that he believes that local broadcasters have been responsive and alert to public safety needs and issues.

Mr. Kanalakis commends two local stations for their interests in public safety and keeping the community safe and informed on issues of crime. He opines that the local media does a great public service for local residents.

**Karas, Judy (8/2/04)**

Ms. Karas attended the FCC hearings in Monterey, California on July 21, 2004. She states that her views were expressed by Sean McLaughlin, FCC Commissioners Copps and Adelstein, and those speakers who spoke in favor of “the open airways” and against increased “monopolization” of the media. Ms. Karas contends that the Commission must regulate the media to balance access to commercial stations for, among other things, public education, campaign coverage, and issues of concern to diversified communities.

**Keegan, Michael, filed under Numerous (11/1/04)**

Mr. Keegan, a professional musician in Milwaukee, WI, and a member of the American Federation of Musicians (“AFM”), Local 8, believes that his union local and the city and county of Milwaukee “can do more to promote local musicians and to come up with performance opportunities in that area.” He further asserts that with regard to “national playlists,” “conglomerates should keep in mind local talent and taste.”

Mr. Keegan also argues that all levels of government should do more to promote the arts in public schools and that both the AFM and the Commission should do more to promote the work of local musicians like himself so that they do not have to “pay someone to have a song, piece, or work aired.”

**Kentucky Broadcasters Association (KBA), Reply Comments (1/3/05)**

KBA states that broadcasters are demonstrating a high level of community involvement and responsiveness, attributable not only to competitive pressures and economic incentives, but to their own sense of public service as well. KBA also states that the absence of rigid national programming rules and standards is helping to ensure that communities enjoy the diverse and unique programs that best suit their interests and



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needs. KBA includes an attachment showing the kinds of public service Kentucky broadcasters provide.

KBA states that the current communications environment - which includes cable, satellite, and Internet offerings in addition to broadcast and print media - provides the vigorous forum for democratic discourse. They also state that requiring broadcast stations to air additional political coverage does not serve the interests and needs of a public that overwhelmingly considers broadcast political coverage to be either "about right" or "too much."

KBA states that, despite the apparent frustration of aspiring musicians or performers with what they perceive as limited access to broadcast facilities, most audience members are satisfied with the mix of formats and content and that broadcasters are responsive to their communities and will support local musicians or performers when their communities do, too.

KBA states that the Commission should take no further action in response to its Notice of Inquiry.

**KISS (FM), filed by Marjorie Coley (11/1/04)**

Ms. Coley states that the news department and station representatives of KISS (FM) attend meetings and press conferences organized by community leaders, and that station representatives also meet with State Representative Tyrone Brooks and local organizations like the Georgia Coalition for the People's Agenda. Ms. Coley also states that KISS (FM) has an open door policy and welcomes input from community leaders and residents.

Ms. Coley states that programming is selected through regular meetings of KISS (FM)'s managers to discuss issues involving the community. She also states that the station airs a weekly program called "This Week in the ATL" and a public affairs show that features community leaders, politicians and others discussing a variety of issues.

Ms. Coley states that KISS (FM) held town hall meetings featuring candidates in the November 2 election and representatives from Election Protection to inform residents of their rights. She also states that the station also offers two public affairs shows in which politicians and newsmakers discuss issues relevant to the community.

Ms. Coley also states that KISS (FM) airs programming related to health care, domestic abuse issues, and issues affecting teens. She also states that the station also aired interviews discussing the conditions in the home countries of Atlanta's immigrant populations from Haiti, Jamaica and the Sudan. Ms. Coley states that the station held fundraising drives to help Haitians and Jamaicans affected by hurricanes.

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Ms. Coley states that KISS (FM) provides information on inclement weather and school closings due to inclement weather and that KISS (FM) also participates in the Amber Alert System.

Ms. Coley states that KISS (FM) interviews many of the artists it features, including some local artists. She states that public service announcements are aired at least five times per day to alert the public of upcoming community events including health fairs, business events and fundraisers. She also states that KISS (FM) informs the community of upcoming events both on the air and on their website.

Ms. Coley also states that KISS (FM) participates in events and fundraisers to benefit local organizations like the Atlanta Community Food Bank and the Georgia Alliance for Children.

Ms. Coley states that KISS (FM) does not advocate that any changes be made to the localism rules.

**KIVI Television, filed by Scott Eymer, Vice President & General Manager  
(10/27/04)**

Mr. Eymer states that KIVI Television broadcasts 35 half hours per week of local news and that KIVI Television preempts ABC when local news and events warrant it. Mr. Eymer states that, during the 2002 election with contested races for Congress and Governor, KIVI Television produced and aired three candidate debates preempting the ABC network. Mr. Eymer states that, in 2003, KIVI Television preempted network programming to cover the Boise City Mayor's resignation and to air a two hour state championship soccer match featuring local children 14-17 in age. Mr. Eymer also states that, in 2004, KIVI Television preempted ABC network to air the Governor's state of the state address and his budget address. Mr. Eymer states that he submits these comments in an effort to illustrate to the FCC the lengths the local station goes to support the betterment of the community served.

**KLEW-TV, Lewiston, Idaho, filed by Fred Fickenwirth (11/1/04)**

Concerning local news, Mr. Fickenwirth states KLEW-TV has a firm commitment to providing local television news to its region consisting of a population of only 55,000 in Lewiston, Idaho, and Clarkson, Washington. He states local residents rely on the station to keep themselves informed with the latest local and regional news, sports, and weather, and it broadcasts 7.5 hours of local news per week. He states it has developed a website, with local and regional news, sports, and weather updated several times daily, and the website also provides local residents with the most comprehensive calendar of community events in the region.

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As for local public affairs, Mr. Fickenwirth states that each quarter KLEW-TV conducts interviews with local community leaders to ascertain important community issues, and that during each weekday morning, it airs two five-minute public affairs programs, and the host interviews guests about these important community issues.

As to program selection, Mr. Fickenwirth states that KLEW-TV strives to select programming that meets the diverse needs and tastes of its viewing audience; it constantly screens programs throughout the year; and e-mails, letters, and phone calls are read, retained, and used when making programming decisions. Mr. Fickenwirth states that KLEW-TV has preempted regular programming to carry special sports events, such as football games of regional interest and the NAIA World Series of Baseball, held in Lewiston.

Concerning emergency programming, Mr. Fickenwirth states that KLEW-TV is prepared to go on-the-air to inform the public if and when a disaster should strike the region. Per satellite and radar weather images access, Mr. Fickenwirth states that KLEW-TV can keep viewers current with approaching weather events, and that it breaks into regular programming in such cases. He states that KLEW-TV participates in the EAS and Amber Alert system.

Mr. Fickenwirth states that, regarding political programming, KLEW-TV offers political candidates the opportunity to speak to the public in an unedited forum on an aired program, "Straight Talk," where each candidate is given speaking time in the weeks leading to an election. He notes that these segments air on the station's local newscasts three times daily.

As for station participation in community activities, Mr. Fickenwirth lists five named local events; he states the station received numerous public service awards and thank-you letter during 2004; and he lists 15 named entities (examples: business chambers, schools, boys-and-girls clubs, state colleges, a music festival) to which the station makes donations. Mr. Fickenwirth states that KLEW-TV honors two local students each week (one athlete and one scholar) which are recognized for their efforts on-air during the station's newscasts and awarded a plaque; the winning student scholars' schools receive \$100 each, and at the end of the school year, the station selects a student of the year, and the winner's school receives \$5,000. Mr. Fickenwirth states that KLEW-TV's website also provides local residents with the most comprehensive calendar of community events in the region.

**KLKN-TV, Citadel Communications LLC, filed by Roger Moody (11/23/04)**

Mr. Moody states that KLKN-TV covers local issues of interest during its local regularly scheduled newscasts and on its website, and that additionally, it breaks into programming to provide timely emergency weather information, school closings, AMBER Alerts, and breaking news information.

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Mr. Moody states that KLKN-TV has an active local ascertainment process. He states that each quarter, it holds an ascertainment meeting and/or meetings in which it invites six to ten guests, representing a cross-section of the community who are asked to complete a "community needs ascertainment questionnaire."

Mr. Moody states that KLKN-TV invests a considerable amount of time and resources in local news programming. He states that it airs four hours of local news programming each weekday and one hour on both Saturdays and Sundays. For example, he states the station has aired in depth news stories on the homeless, local high schools, health initiatives, a potential smoking ban, and local gambling initiatives. In addition, KLKN's Eyewitness News Forum segments air during its midday program, and primarily focus on local events and issues, featuring local community leaders, volunteers, event participants, agency representatives, etc. Mr. Moody states that KLKN-TV also is committed to covering political elections and local sports, and that it also airs public service announcements for local events and projects including the Salvation Army's Holiday Campaign, Make-A-Wish Foundation, and the American Cancer Society's Walk for the Cure.

**Knapp, Jeannette (1/28/04)**

Ms. Knapp comments that she appreciates and relies on the religious broadcasting of the First Baptist Church.

**KOLN/KGIN-TV (11/30/04)**

KOLN/KGIN-TV state that they provide television coverage to two-thirds of Nebraska. The stations state that, in addition to local daily produced newscasts, they produce several community and public service programs throughout the year. Various examples of such programming are provided.

The stations state that they air five newscasts on Monday through Friday for a total of 3.5 hours of local programming daily. The stations state that they also provide viewers with information regarding local emergencies, severe weather, school closing information, Amber Alerts and Homeland Security Alerts. They provide examples of continuous coverage during severe thunderstorms that produced several tornadoes, including how volunteers could help with rebuilding.

The stations state that they provided viewers with information on the 2004 election, including informing viewers about ballot issues and providing election night results. In addition, the stations state that they cover various local events such as high school sports and parades. Examples are provided of a number of specific charitable and fundraising events in which these stations have participated and promoted.

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*KOLN/KGIN state that every effort is made to respond to viewers and listen to viewer comments and concerns about programming, public service, and news stories.*

**KRNV NEWS 4 Television (10/28/04)**

News 4 states that it is committed to informing and educating viewers in the local area. News 4 states that it airs 31 newscasts per week with 12% of daily programming devoted to local news. In addition, News 4 provides examples of specific local public affairs, politics, and community activity programming.

News 4 provides examples of emergency programming provided in response to various local emergencies, and states that it also participates in Amber Alerts and EAS as a local primary or monitoring station.

News 4 provides examples of political programming aired during the 2004 Presidential election, and states that it also participated in a local voter registration drive in 2004.

News 4 provides examples of civic, cultural and other community-responsive programming, and states that it airs approximately 100 public service announcements per week.

News 4 also states that it covers local artists, and that station executives are on the board of a number of local organizations.

**KTNV-TV (11/1/04)**

KTNV-TV states that it participates in many local efforts to keep the audience informed and to improve their lives. KTNV-TV states that its consumer advocacy program recovers or saves over one million dollars for consumers in the community. KTNV-TV asserts that it supports many community charities through news coverage of events, promotions, and public service announcements. KTNV-TV states that it provides 36 hours of weekly local news, combined with over 28 hours of ABC network news. To provide live local coverage, KTNV-TV states that it has invested in five live ENG trucks, a helicopter, five tower cameras, and a weather tracking system. KTNV-TV opposes additional rules to mandate localism, fearing that it would interfere with the station's ability to maintain and properly promote its community projects.

**KTRE, Nacogdoches, Texas (10/27/04)**

KTRE states that one sixth of their overall weekday programming is local news, and that their news coverage reflects the values and standards of their viewers. In addition to local news, issues and events, KTRE airs special reports that focus on local people and issues. KTRE also focuses on sports in local schools, participates in community activities and charities, and airs public service announcements.

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**KTVL-TV (12/21/04)**

KTVL-TV states that it presents seventeen hours of local news, weather and sports each week as well as participates in various other community activities. KTVL-TV lists 9 recurring news segments that address local concerns including "Crimestoppers", a weekly segment that involves viewers in assisting authorities by identifying at-large criminals; "Informed Health Choices", a monthly segment that provides information on cancer prevention; and "On the Beat", a weekly on-set interview with a local policeman who shares law enforcement tips and information.

KTVL-TV states that it is involved in the community through contact with business and political leaders, and viewer comments which allow it to ascertain the needs of the communities it serves, and determine what programming to acquire and present.

KTVL-TV states that it also includes emergency news and weather information within our local newscasts, and in special reports as merited. This includes Amber Alert information, severe weather information, plus weekly and monthly EAS tests.

During the 2004 Campaign season, KTVL-TV states that it participated in and presented a number of projects and reports designed to engage viewers, encourage a discourse of the major issues facing our region, state and country, and inspire viewers to participate by voting.

**KXLO Radio, filed by Fred Lark (11/1/04)**

Mr. Lark states the Commission needs to make the concept of "broadcasting in the public interest, convenience, and necessity" a requirement for radio station owners. Also, he states that each station owner should be compelled to complete a "Community Service Survey" prior to allowing ownership changes, and that each owner should be required to renew that commitment at the time of license renewal.

Mr. Lark states that his station, KXLO, provides ample local programming to its Central Montana market area. He says it is unfortunate that large owners have created such a poor image for broadcasters by their lack of local programming and lack of concern for rural communities.

**KZLA FM (11/2/04)**

KZLA states it makes a concentrated effort to report local news stories to its listeners. Its Morning Show commits four segments each weekday morning to local and national news, in addition to weekly segments with NBC. It says it has developed a partnership with local TV station ABC 7, and each weekday afternoon, a KZLA afternoon show discusses local news, with a link to ABC 7's website on KZLA's website.

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KZLA states that it airs a half-hour public affairs program produced in-house covering a range of issues and events in the public interest (it mentions recent guests and subjects discussed).

It says it encourages listeners to write, fax, or e-mail suggestions to the station's Program Director, conducts weekly research and annual auditorium tests for its music and invites listeners to participate in focus groups quarterly.

The station states it is mindful of local breaking news events, such as traffic and severe weather, and that station DJs are encouraged to monitor TV News stations for breaking reports, with traffic reports given more frequently if there is inclement weather. It notes that traffic reports may include updates on weather, fires, Amber alerts, etc. KZLA states that it participates in EAS and conducts both weekly and monthly tests.

According to KZLA, during election times, all KZLA hosts regularly remind listeners to register to vote and vote on Election Day. This year, it states that it also aired several PSAs having various entities in the months before the election encouraging listeners to vote, and had the LA county registrar recorder call in to discuss the new voting system for LA County.

The station states that it airs up to 100 PSAs weekly, with a wide range of topics (examples given). KZLA states it makes a concerted effort to ascertain community needs and airs PSAs addressing the issues the community deems most important. KZLA lists various subject areas and actions demonstrating its community involvement.

KZLA states it strives to bring a diverse country music selection to Southern California, claiming it was the only country station in the nation airing a musical group's songs on a CD; was the first station to play a particular duet in regular rotation, and was the only station to play another named artist's song that also had not been released as a single. In addition, the station states it proudly airs a country music show Sunday night for two hours featuring songs from a number of artists, and it airs each Thursday night whereby the host plays a song from a local Southern California artist. KZLA says it also supports local music by inviting several local artists to play at shows produced by KZLA and it describes its coverage/promotion involving other local musical artists.

KZLA states that, since the 9/11 attacks, it has made an annual effort, branded "Operation Hugs from Home," to recruit supplies for many military families struggling financially while a loved one serves the country, and works hand-in-hand with organizations to donate supplies to military families, as well as writing letters of thanks to soldiers overseas. It also describes its participation in other areas designed to assist families and troops overseas. It mentions its annual raising of money to provide education and support for parents and young children with hearing loss.

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**Lakefront Communications, filed by Tom Joerres (Lakefront) (11/2/04)**

Lakefront provides examples of its commitment to localism. Lakefront operates five radio stations in the Milwaukee, WI area. It states that it reports on local news, traffic, and weather, and offers EAS and Amber Alert programming. Lakefront explains that it has programs featuring local musical acts. It also describes its annual broadcast marathon to benefit local Children's Hospital (\$1.4M in 2004). Lakefront sponsors a local music festival and various local civic and charitable events.

**Langell, Ted (6/28/04)**

Mr. Langell comments that localism is in jeopardy or is nonexistent for a number of smaller communities in his region of California between the Sacramento and Chico markets. Mr. Langell urges the Commission to make owners attend the communities to which their stations are licensed, not the larger, well-served market 30-50 miles away; enable electronic comments in Community of License changes and all proceedings; and require Community of License changes to be published in a local newspaper and to be broadcast at the time of filing and throughout the comment periods. Mr. Langell states that the Commission should hold off on using vacant TV frequencies for unlicensed technology until the following has occurred: the DTV transition is more settled; the freeze on Low Power TV/Class A television applications is lifted; people have had time to apply, win, build and make Low Power/Class A television a reality in their markets; and there are real-world tests of the wireless broadband devices in operation and the interaction with analog and digital TV.

Mr. Langell also states that to have effective local use of LPTV and Class A stations, the Commission should require cable operators to promote the availability of Leased Commercial Access and simplify the cable Leased Commercial Access rate calculation formula. For radio and television, Mr. Langell urges the Commission to require stations to air community programs; require community programs to be aired when there is normally a substantial audience, and not at 4 a.m. or 5 a.m. on Sunday morning; require stations to let people know about the Public Inspection File and how to use it; and require a percentage of local programs.

**Lautenberg, Frank R., United States Senator (1/3/05, 1/18/05)**

Senator Lautenberg submits a report (the Report) entitled, "Localism: Statutes and Rules Affecting Local Programming on Broadcast, Cable and Satellite Television," prepared by the Congressional Research Service (CRS). Senator Lautenberg indicates that the Report documents that millions of television households in New Jersey and several other states have little or no access to broadcast television stations that serve the local needs and interests of the viewing community. Senator Lautenberg urges the Commission to consider the findings contained in this CRS Report.



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*Senator Lautenberg states that the current FCC rules impose an explicit public interest obligation on broadcast licensees to serve the interests of viewers within the city of license. He believes, however, that these rules are not enforced.*

***From CRS Report Summary:***

Most broadcast television stations' viewing areas extend far beyond the borders of their city of license, and in many cases extend beyond state borders. Under existing FCC rules, which are intended to foster "localism", the licensee's explicit public interest obligation is limited to serving the needs and interests of viewers within the city of license. Yet, in many cases, the population residing in the city of license is only a small proportion of the total population receiving the station's signal. Hundreds of thousands of television households in New Jersey (outside New York City and Philadelphia), Delaware (outside Philadelphia), western Connecticut (outside New York City), New Hampshire (outside Boston), Kansas (outside Kansas City, Missouri), Indiana (outside Chicago), Illinois (outside St. Louis), and Kentucky (outside Cincinnati) have little or no access to broadcast television stations with the city of license in their own state.

The same holds true for several rural states – including Idaho, Arkansas, and especially Wyoming, where 54.55% of television households are located in television markets outside the state. Although market forces often provide broadcasters the incentive to be responsive to their entire serving area, that is not always the case. The report provides, for each state, detailed county-by-county data on the percentage of television households located in television markets outside the state and whether there are any in-state stations serving those households.

The Nielsen Designated Market Areas ("DMAs") also often extend beyond state borders. Local cable operators are required to carry the broadcast signals of television stations located in their DMA. If they are located in a DMA for which the primary city is in another state, and most or all of the television stations in that DMA have city of license in the other state, then the broadcast television signals they must carry will be primarily or entirely from out of state. In some cases, they may not be allowed to carry signals from within the state but outside the DMA to provide news or sports programming of special interest in their state because of network non-duplication, syndicated exclusivity, or sports programming blackout rules or because of private network affiliation contract agreements, or may be discouraged to do so because these signals do not qualify for the royalty-free permanent compulsory copyright license for local broadcast signals.

Satellite television operators are permitted (not required) to offer subscribers local television signals. Where they do provide this "local-into-local" service, they are explicitly restricted by law to the provision of the signals of those broadcast television stations with city of license within the DMA in which the subscriber is located. Except in specific atypical circumstances, satellite operators are prohibited from offering a subscriber the signals of a broadcaster that is located in the subscriber's state but outside the subscriber's DMA. H.R. 4501, S. 2013, and S. 2644 include provisions that would

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expand the broadcast television signals that subscribers can receive as part of local-into-local service.

The Report lists four issues for Congress to consider. First, it suggests Congress might choose to direct the FCC, in that proceeding, to undertake a rulemaking to explicitly identify, or provide written guidance about, the obligations of licensees with city of license in an outlying city to a major city to specifically serve the needs and interests of the viewers in their city of license. It also suggest that Congress might choose to direct the Commission to address how it would enforce those obligations. For example, under what circumstances, if any, could failure to serve the needs and interests of its community of license result in a license not being renewed (or being revoked)?

Second, the report suggests that Congress might choose to direct the Commission, as part of its current proceeding on broadcast localism, to explicitly identify, or provide written guidance about, the obligations of licensees to serve the portion of their viewership that lies outside the city of license but not in large nearby cities with their own licensed broadcast television station or might choose to direct the Commission to address how it would enforce those obligations.

Third, the report suggests that as the Commission develops rules addressing digital broadcast television public interest obligations, it might try to construct rules that foster programming that meets the possibly divergent needs of viewers within the city of license and viewers beyond the city of license. For example, the Commission might consider modifying the current rule that requires cable operators to carry only the primary programming stream of each local television broadcaster by requiring cable operators to carry each programming stream that offers distinct programming aimed at a different, previously unserved geographic portion of the broadcaster's serving area.

Fourth, the Report notes that a satellite operator cannot offer that subscriber in-state but outside-the-DMA broadcast signals as local-to-local service. According the Report, these restrictions deny some subscribers access to programming they may want and, in so doing, place satellite systems at a competitive disadvantage vis-a-vis cable systems that under many circumstances can negotiate retransmission consent agreements to provide such programming. The Report suggests that one possible solution is to give satellite operators (and their subscribers) the same access to local broadcast programming as cable operators enjoy by taking steps that would expand the choice of broadcast television station signals that satellite systems can provide as local-into-local service.

Another possible step, according to the report, would be to add to the local-into-local rules the same flexibility provided by the "localism exception" in the cable must carry rules. A third possible step would be to allow satellite operators to offer as local-into-local service the broadcast signals of stations that are "significantly viewed" in the county in which the subscriber is located. A third step might be to address the current discrepancy in the copyright laws as they apply to the secondary transmission of local broadcast signals by cable and satellite operators. A fourth possible action would be to

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address the current discrepancy in the copyright laws as they apply to the secondary transmission of local broadcast signals by cable and satellite operators.

**Leach, James D. (6/17/04)**

Mr. Leach, a native of South Dakota, is dissatisfied with coverage of the 2002 elections in South Dakota and asserts that the “domination of print and broadcast media in South Dakota by a few sources who listen mainly to each other” resulted in what he perceives to be a false story – alleged voter fraud among Indians in South Dakota.

Mr. Leach claims that “South Dakota media – print and broadcast alike – repeated these allegations over and over and over again, in an incessant drumbeat over the last 30 days of the campaign. This was pack journalism at its worst.”

Mr. Leach states that, “the smaller the number of (media outlet) owners, the smaller the media pack, and the harder for those not part of it to be heard.” He also recommends that local radio station KILI, located on the Pine Ridge Indian reservation, should be a model of localism that the FCC should encourage and that South Dakota media outlets not repeat speculative news stories that may not have a basis in fact.

**League of Woman Voters (LWV) (10/24/03)**

LWV states that \$1 billion was spent on political TV advertising in the 2002 election and that it is unfair that broadcasters charge such high prices for political ads the closer it gets to Election Day. LWV states that the airwaves belong to the public and that broadcasters have an abundance of talent and creativity that should be directed toward programming that informs the public on issues of voting, elections and who is running for office.

**Leander, Clayton (7/21/04)**

Mr. Leander expresses his support for the efforts of the Localism Task Force and the public hearings on broadcast localism. Mr. Leander expresses concern, however, regarding the qualifications of Pappas Telecasting to speak on the localism panel. Mr. Leander contends that Pappas is an example of a station that has almost no local community-based programming, except for a few evening segments in the late night hours. Mr. Leander states that Pappas has not demonstrated interest in reaching out and helping to cultivate a needed media presence that is representative of the local community.

**The Lear Center Local News Archive (2/7/05)**

The Lear Center provides an analysis of evening news broadcasts aired between 5:00 pm and 11:30 pm by 44 affiliates of ABC, CBS, Fox and NBC in 11 markets during the 29-day period from October 4 to November 1, 2004. The study examines the following

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television markets: New York, Los Angeles, Philadelphia, Dallas, Seattle, Miami, Denver, Orlando, Tampa, Dayton, and Des Moines.

The Lear analysis finds that almost two in three of all news broadcasts contained at least one campaign related story. The analysis also finds that coverage of the presidential election dominated local station coverage. For example the analysis finds that, although fifty-five percent of broadcasts contained a story regarding the presidential election, just eight percent contained a story about a local candidate race including campaigns for U.S. House, state senate, mayor and other regional offices. The analysis also finds that eight times more coverage went to stories about accidental injuries, and 12 times more coverage to sports and weather, than to coverage of all the local races combined. In addition, the analysis finds that more news stories focused on campaign strategy and the horserace (44%) than campaign issues (32%).

The Lear analysis notes that, in races for the U.S. Senate, political ads outnumbered news time coverage by as much as 17-to-one, and in the U.S. House races by as much as seven-to-one. Not one story about a race for the House appeared on local television news in Los Angeles during the study period, according to the analysis.

**Leggett, Nickolaus E (10/14/03)**

Mr. Leggett comments that the legitimacy of the American broadcasting structure depends on the presence of a local component to broadcasting. He believes the best argument for big centralized media has been the shortage of radio frequencies. However, according to Mr. Leggett, this shortage is fading since millimeter radio frequencies could be used for community broadcasting. He states that these frequencies have a fairly high level of atmospheric signal absorption that creates naturally enforced coverage cells and encourages frequency re-use.

Mr. Leggett states that another argument for big centralized media is the economy of scale. However, he states that individuals and local groups could finance tiny microradio broadcasting stations. Leggett explains that some options to promote localism include: increased licensing of LPFM; establishment LPAM; establishment of a Citizens Broadcasting Band (CBB) on frequencies other than those currently used for domestic broadcasting; establishment of an Open Microphone service operated with funds provided by large broadcasting corporations; requiring full-power stations to offer no-charge sub carrier channels to community organizations; requiring full-power stations to provide a minimum of local programming; researching the use of millimeter waves and light waves; and evaluating Internet audio streaming for local broadcasting.

**Leggett, Nickolaus E (11/6/03)**

Mr. Leggett comments that the development of millimeter wave radio technology (30 GHz to 300 GHz, AKA the Extremely High Frequency (EHF) band) promises to reduce

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or eliminate radio spectrum shortages. He states that the millimeter wave band has a huge capacity because it is so much larger than the lower frequency bands, providing an opportunity for a large number of users.

According to Mr. Leggett, there is significant atmospheric absorption of the signals which would prevent a neighborhood broadcaster from interfering with a nearby broadcaster. He states that a millimeter wave installation is typically engaged in point-to-point communication using a narrow beam formed by very high gain antennas, also known as pencil beam communication. Mr. Leggett states that a pencil beam can be converted into an omnidirectional broadcasting system by using a rotating beam. He states that a high-gain transmitting antenna is mounted so that it can be continuously rotated in a similar manner to a plan position indicator (PPI) radar antenna. Mr. Leggett states that the neighborhood broadcasting station would transmit packets of content to receivers, and that each receiver would store the packets and play the program to the listener.

Mr. Leggett states that the rotating beam could interfere with existing paths, and that regulatory provision will need to be made for millimeter wave broadcasting systems, and perhaps specific fairly millimeter wave frequency bands.

**Leggett, Nickolaus (7/29/04)**

Mr. Leggett contends that local origination of broadcast programming will be increased if we increase the number of independent stations. According to Mr. Leggett, LPFM and LPAM is a very useful local outlet, increasing the opportunity for local news, groups, and artists to get on the air. Mr. Leggett states that when taking into account the millimeter wave and higher frequency bands, the spectrum is truly huge with enough room for everyone who wants to be a broadcaster. He believes the time to establish a right to broadcast has come.

**Leggett, Nickolaus (10/5/05)**

Mr. Leggett states that the Commission's LPFM rules permit the operation of LPFM stations running approximately 10 Watts of power (LP10 stations). He states that LP10 stations can be used to organize local community responses to the emergency, and can be operated from emergency sources of power such as batteries, small backup generators, solar cell arrays, or hand-cranked generators. He also states that LP10 stations are small and can be carried to higher ground or to an intact building. Mr. Leggett requests that the Commission act quickly to set up application filing windows for these LP10 LPFM radio broadcasting stations.

**Livingston Radio Company (11/1/04)**

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Livingston Radio Company states that programming on radio stations is dictated by public demand, and public demand will always be a far more effective influence than governmental regulation. Livingston Radio Company also states that many of the changes in radio programming over recent years are the result of a Congressional decision to permit increased consolidated ownership, along with dramatic changes in technology that have increased competition, forcing broadcasters to be more, rather than less, responsive to local public needs and interests.

**Lodes, Mary (1/28/04)**

Ms. Lodes comments that she appreciates the religious broadcasting of the First Baptist Church.

**Lopez, Daniel (1/28/04)**

Mr. Lopez submits a letter related to a religious program shown on Sundays, involving sermons by Pastor Don Guthrie, First Baptist Church, San Antonio, TX. Mr. Lopez advocates that the pastor's program not be disconnected or taken off the air, due to a "new law that is coming about the radio and TV." The letter was submitted in response to a request by Pastor Guthrie to listeners to write a letter on this topic.

**Low Power AM Team (12/5/03)**

The Low Power AM Team supports the establishment of Low Power AM licensed service as a way to introduce more local, community-based broadcasting. The Low Power AM Team describes some problems with the Baumgartner Petition for Low Power AM, and offers suggestions for improving the service. The Low Power AM Team urges the Commission to take a serious and thoughtful look at the Baumgartner Petition.

**Max Media of Montana LLC (Max Media) (5/27/04)**

Max Media asserts that the Commission's network territorial exclusivity rule – which limits the amount of territorial exclusivity stations licensed to other (or neighboring) communities can obtain from a television network – is germane to the localism issue, and seeks the Commission's affirmation of the rule. (Max Media notes that at the time of this filing, the Commission was considering a Request for Expedited Declaratory Ruling it filed on the matter.)

Max Media writes, "[a]s broadcasters in Montana, we take pride in our independence. We are accountable for our own successes and failures. We do, however, need to do business and compete in an environment where the playing field is level, especially in a small community when it comes to network programming. I do not know of a single TV station in a market smaller than 100 that is not affiliated with a network. Without access

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to network programming, a station cannot pay for only syndicated product **and** produce **local** programming.” (emphasis in original).

Max Media further states, “[t]his [network territorial exclusivity] rule has served our industry well for many years and the **certainty** of the rule is the foundation we rely on when bargaining for network programming.” (emphasis in original).

According to Max Media, the purpose of the network territorial exclusivity rule is to ensure that local stations have a fair opportunity to acquire network programming by limiting the amount of territorial exclusivity [that] stations licensed to other (or neighboring) communities can obtain from a television network.

Max Media also notes, “[l]ocal news service is very expensive in markets like Rapid City because advertising revenues are not as plentiful as in a market like Memphis. As a result, stations in markets like mine must have reliable network relationships – which are far more likely to exist, if the territorial exclusivity limits are enforced. Local news commitments are not expenses that can be turned off like a light bulb. If you lose all of a station’s programming supplied by a network, continued funding of local programming is unrealistic.”

**McCauley, Amanda, filed under Amanda McGulley (10/5/04)**

Ms. McCauley believes that broadcasters must be required to do more to enhance civic participation, and that the FCC must define minimum standards for broadcasters to fulfill their public interest obligation through coverage of elections and civic affairs.

**McClintock, Nancy, filed under Numerous (8/23/04)**

Ms. McClintock states that, on the Monterey Peninsula, CA, “citizens must be able to receive signals from PBS, Pacifica, a few NPR station programs and BBC in order to get first-hand information from investigative reporters on issues and actions vital to our survival.” These issues include “access to health care, affordable housing, care of the homeless, care of the elderly, state of the physical and political infrastructure, changes in educational procedures” and other issues. Ms. McClintock urges the Commission to protect these valuable resources and to allow access to all sides of issues, not the limited party line.

**Media General/WJTV (10/29/04)**

WJTV, the CBS affiliate in Jackson, Mississippi, states it is proud to be a part of the central Mississippi area and strives every day to bring to its viewers the best local news, entertainment, and sports programming. It adds that it works to improve the community through station sponsorships, creating local events, giving its time through volunteerism, and providing the information and the means to keep its viewers safe.

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WJTV states its first priority is its news product, as nine and one-half hours of its 24-hour weekday broadcast days are devoted to news programming, and it interrupts regularly scheduled programs to provide extended coverage of events affecting its broadcast area and to issue AMBER alerts. The station gives two examples of what it characterized as extensive coverage it provided concerning tragic stories that united its local communities in grief. WJTV also states it devotes special coverage to local sports stories, mentioning, *e.g.*, various football and basketball items. It says its biggest importance relates to its coverage of severe weather threatening Mississippi (describing *e.g.*, its Hurricane Ivan coverage) and that it alerts viewers quickly regarding severe weather warnings. WJTV says that, to provide extensive local news, weather, and sports coverage to its viewers, it continues to make huge capital investments in technology.

WJTV states it informs its viewers on local government by sponsoring live coverage of local candidate debates, live inaugurations, swearing-in of governors, and that it preempts prime time network programming to provide extended coverage of local election results. It describes its activities related to the November 2004 election season.

It states it exposed a serious flaw in the reporting of convicted sex offenders, and covered local gang activities. It states that its broadcast stories include mentions of its website so viewers can access important information including links to other websites of interest (*e.g.*, CBS News, CNN, and Jackson's Clarion Ledger newspaper). It states its website is used for local citizens to voice their opinion to the station on issues of the day through daily web poll questions and on WJTV programming. It further states the website is used by citizens to send messages for the station General Manager and other station heads. WJTV says it routinely airs announcements specifically addressing issues of crime, consumer fraud, and medical/health.

WJTV provides the following examples of off-air community service: partnerships with deserving organizations that help improve the area's communities; many WJTV employees serve as board members and volunteer for individual events; WJTV sponsors an adopted elementary school; and the station is committed to work with local organizations to raise money for worthy causes. It also says it helps with charitable events and is proud to be the area TV station affiliated with the Children's Miracle Network. Further, it seeks to help bring popular and cultural events through sponsorships and on-air publicity.

**Mercer Island School District #400 (Mercer) (1/3/05)**

Mercer states that it is the owner of KMIH-FM at Mercer Island, Washington. Mercer expresses support for proposals to improve FM radio's spectrum efficiency for LPFM applicants and for current low power operators, including both LPFM and current grandfathered Class D educational FM stations.



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Mercer notes that nearly all Class D and LPFM stations have strong connections to local entities, such as in the case of KMIH. According to Mercer, this local connection makes it possible for individuals who live in the communities under which licenses are assigned to work for those stations and to be familiar with the "pulse of their local communities."

Mercer asks the Commission to streamline its current rules and to adopt proposals that will enhance broadcast localism. In particular, Mercer asks the Commission to adopt technical receiver rules that will ensure that all 100 FM broadcast channels can be received on newly purchased FM receivers. Finally, Mercer suggests that the Commission conduct a study of the new technical abilities and requirements of modern radio receiving apparatus, and eliminate any "broad, outmoded technical IF separation requirements that are no longer needed."

**Meyer Communications, Inc. (Meyer) (1/3/04)**

Meyer is a 42-year-old media company, which operates four radio stations in the Springfield, Missouri market: KTXR-FM, KWTO-AM, KWTO-FM and KBFL-FM. Its competitors include Clear Channel, Journal Broadcast Group and Mid-West Family Broadcasters. Meyer states that it is the only locally-owned cluster remaining in this market.

Meyer supports localism, noting that its staff serves on a number of community service organization boards, its news director serves on the Missouri Associated Press board of directors, and its stations have sponsored numerous community events in 2004. Meyer stresses the importance of locally produced, locally-oriented programming and states that three of its stations provide "extensive" locally-oriented programming. For example, Meyer explains that its station, 101.3 KTXR, plays exclusively locally programmed music 24 hours a day and hires "on air talent" who live in the Springfield area. Meyer states that KTXR also carries Southwest Missouri State University football and men's and women's basketball games, which amounts to more than 80 games a year and more than 400 hours of locally-produced sports. Meyer states that KBFL carries around an hour a day of local programming.

Meyer states that its station, KWTO-FM, carries 33 hours of locally-produced sports programs each week and an estimated 1500 hours of locally-produced sports programming a year, including local high school, college, and minor league sporting events. Meyer explains that its station, KWTO-AM 560, which has a news-talk show format, is the "lone remaining heritage AM" in the market. Meyer notes that nearly one-quarter of KWTO-AM's weekly programming is produced in Springfield, not counting the station's 26 daily local newscasts. Finally, Meyer states that, its station, 99.9 KBFL, which is a satellite-delivered adult standards station, also carries approximately one hour of various local programming.